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Attorney for Pension Benefit Guaranty Corporation

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

INTERNATIONAL LONGSHORE
AND WAREHOUSE UNION,

Debtor.

CASE NO: 23-30662-HLB

Chapter 11

**NOTICE OF APPEARANCE AND REQUEST FOR ELECTRONIC NOTICE
BY THE PENSION BENEFIT GUARANTY CORPORATION**

PLEASE TAKE NOTICE that the Pension Benefit Guaranty Corporation (“PBGC”), a wholly-owned United States Government Corporation under 29 U.S.C. § 1302, an agency of the United States Government under 28 U.S.C. § 451 and 11 U.S.C. § 101(27), and a creditor under 11 U.S.C. § 101(10) in the above-captioned case, hereby files this Notice of Appearance pursuant to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Civil L.R. 11-2, and requests, pursuant to Section 1109(b) of Title 11, United States Code and Bankruptcy Rules 2002(j)(4), 3017(d) and 9007, that notice of all matters which may come before the Court concerning the above-captioned case and debtor be given to and served upon PBGC at the two e-mail addresses listed below.

1 This request includes, *inter alia*, the notices and papers referred to in Bankruptcy Rules 2002,
2 3017 (including all disclosure statements and plans of reorganization) and 9007, notices of any
3 orders, applications, complaints, demands, hearings, motions, petitions, pleadings or requests, and
4 any other documents brought before this Court in this case, whether formal or informal, *ex parte* or
5 on notice, written or oral, or transmitted or conveyed by mail, electronic mail, personal delivery,
6 telephone or facsimile, or otherwise.

7 PLEASE TAKE FURTHER NOTICE that this entry of appearance and request notice is
8 without prejudice to PBGC's rights, remedies and claims against other entities or any objection that
9 may be made to the jurisdiction or venue of the Court or venue of this case, and shall not be deemed
10 or construed to be a waiver of PBGC's rights: (i) to have final orders and non-core matters entered
11 only after *de novo* review by a district court, (ii) to trial by jury in any proceedings so triable in this
12 case or in any controversy or proceeding related to this case, (iii) to have the district court withdraw
13 the reference in any matter subject to mandatory or discretionary withdrawal, or (iv) to assert any
14 other rights, claims, actions, defenses, setoffs or recoupments to which PBGC is or may be entitled in
15 law or in equity, all of which PBGC expressly reserves.

16 DATED: October 17, 2022
17 Washington, D.C.

Respectfully submitted,

18 /s/ Mai Lan G. Rodgers
19 Mai Lan G. Rodgers (Bar No. VA 91024)
20 Attorney
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CERTIFICATE OF SERVICE

This is to certify that a copy of the Pension Benefit Guaranty Corporation's Notice of Appearance and Request for Electronic Notice was served on October 17, 2023 to the parties listed below:

Debtors' Counsel via CM/ECF

Debra I. Grassgreen
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/s/ Mai Lan G. Rodgers
Mai Lan G. Rodgers